

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SOFIYA GJANBOLAJ,

Plaintiff,

1:08-cv-03003 (DLC)

-against-

BRAUN DIVISION OF GILETTE,
THE GILETTE COMPANY and
PROCTER & GAMBLE COMPANY,

Defendant.

-----X

STIPULATION REMANDING MATTER TO STATE COURT

IT IS HEREBY STIPULATED AND AGREED, by and between the below-named counsel for the parties to the above-captioned matter as follows:

WHEREAS this case was originally filed by plaintiff in the Supreme Court for the State of New York located in Kings County; and

WHEREAS this case involved parties who are diverse to each other; and

WHEREAS the defendants in this case removed this case to this Federal Court on the basis of diversity; but

WHEREAS the parties have stipulated that the amount in controversy, inclusive of interest and costs, does not exceed seventy-four thousand nine hundred ninety-nine dollars (\$74,999.00), and the plaintiff has agreed that under no circumstances shall any recovery in this matter exceed seventy-four thousand nine hundred ninety-nine dollars (\$74,999.00). (See Stipulation, attached hereto as **Exhibit "A"**).

It is therefore stipulated and agreed that it is appropriate that this matter be remanded to the Supreme Court of the State of New York for the County of Kings.

Dated: White Plains, New York
June 9, 2008

GOLDBERG SEGALLA, LLP
By: s/ Brian T. Stapleton, Esq.
Brian T. Stapleton, Esq.
170 Hamilton Avenue, Suite 203
White Plains, New York 10601
(914) 798-5400
Attorney for the Defendants
The Gillette Company and Procter and
Gamble Company

IRINA P. VAIMAN, P.C.
By: s/ Irina P. Vaiman, Esq.
Irina P. Vaiman, Esq.
1322 Gravesend Neck Road
Brooklyn, New York 11229
(718) 743-6611
Attorney for the Plaintiff
Sofiya Gjanbolaj

SO ORDERED:

Denise L. Cote, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on June 9th, 2008, a copy of the foregoing Stipulation was filed electronically and served by mail upon anyone unable to accept electronic filing. Notice of this filing was will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

By: s/ Brian T. Stapleton, Esq.
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

SOFIYA GIANBOLAJ,

Plaintiff,

08 Civ. 3003 (DLC)

-against-

BRAUN DIVISION OF GILETTE,
THE GILETTE COMPANY and PROCTER & GAMBLE
COMPANY,

Defendant.

X

STIPULATION REMANDING MATTER TO STATE COURT

IT IS HEREBY STIPULATED AND AGREED, by and between the below-named
counsel for the parties to the above-captioned matter as follows:

WHEREAS this case was originally filed by the plaintiff in the Supreme Court for the State
of New York located in Kings County; and

WHEREAS this case involves parties who are diverse to each other; and

WHEREAS the defendants in this case removed this case to this Federal Court on the basis
of diversity; and

WHEREAS the parties have agreed that the amount in controversy, inclusive of interest,
fees and costs, does not exceed SEVENTY-FOUR THOUSAND NINE HUNDRED NINETY-
NINE DOLLARS (\$74,999.00); and

WHEREAS the plaintiff has agreed that under no circumstance shall any recovery in this
matter, inclusive of interest, fees, and costs, exceed SEVENTY-FOUR THOUSAND NINE
HUNDRED NINETY-NINE DOLLARS (\$74,999.00);

IT IS THEREFORE STIPULATED AND AGREED that

1. It is appropriate for this matter be remanded to the Supreme Court of the State of New York for the County of Kings;
2. A photocopy or facsimile of this completely executed Stipulation may be filed with the Court as having the full force and effect as if the original were so filed; and
3. This Stipulation may be executed in counterparts; each counterpart shall be treated as an original and all counterparts together shall constitute one and the same instrument; and
4. Such Stipulation may be entered by either party against the other without further notice to any other party.

Dated: White Plains, New York
May 20, 2008

GOLDBERG SEGALLA, LLP

By:

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By:

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